BUSINESS TASK FORCE ON REGULATORY IMPACT

Recommendations for Priority Reviews of Existing Regulation and Changes to the Regulatory Impact Statement Policy

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Recommendations for Priority Reviews of Existing Regulation

Background

The task force mandate includes advising on a review of existing regulatory frameworks and operations in the province to promote the goals of the Streamlining Initiative. By existing regulatory frameworks, we mean the current regulation of:

- a particular industry, such as insurance companies, motor dealers, or mining exploration;
- a particular activity or policy area, such as commercial recreational land use, pesticide handling, employment standard or the building code;
- a particular aspect of a policy area, such as the hours-of-work part of employment standards regulation or fire commercial vehicle licensing provisions in the Local Government Act;
- a particular aspect of the regulation of a particular industry, such as the hours of work provisions as they apply to silviculture, or the licensing requirements for real estate agents; or
- cross-cutting issues that apply or have been developed under a number of regimes, such as complaint procedures or disclosure requirements.

In August 2000, the government accepted task force recommendations for a Strategic Review of Existing Regulation. This will be a broad review. All regulation and its enforcement are eligible for review. However, the review will also be focused strategically on priorities identified in task force recommendations. (For reference, Appendix 4 contains the government's Policy for the Strategic Review of Existing Regulation).

Priority Recommendations

Our recommendations for the priority reviews of existing regulation are based on submissions we received from business, labour, communities and others. This is consistent with our view that those who are regulated are the best source of ideas for making things work better. We invited submissions from August to December 2000. The task force was disappointed with the relatively low response to our invitation, and we strongly encourage further submissions. Nonetheless, we did receive some valuable ideas, a summary of which is attached (Appendix 5).

To determine recommendations for the initial priorities, task force members considered whether an area had been reviewed recently or was part of a current review, as well as the resource requirements and potential impact of a review. We wanted to avoid completing reviews that produce minimal or unknown impacts, as has been reported in other jurisdictions.

As a result of our deliberations, some suggestions have been deferred for later consideration. In a few cases, we are not persuaded that a review would be useful; however, we would consider further submissions in these areas.

In the end, we have identified nine priorities that we recommend for review:

- cut red tape in government forms pertaining to the retail sector;
- eliminate unnecessary signature requirements to smooth the transition to e-government;
- simplify statutory holiday pay calculation;
- create one window for coloured fuel emblems and agricultural vehicle licensing;
- overhaul the Wildlife Act[1];
- allow home offices for travel agents and insurance agents;
- update some of the market conduct regulation under the Financial Institutions Act (rebating and tied-selling prohibitions);
- streamline pest management regulation; and
- carry out a red-tape canvas of government agents.

The reviews are intended to:

- repeal or replace outdated requirements;
- move from command and control regulation to performance standards where possible;
- reduce paperwork burden and clarify requirements;
- streamline administration and enforcement; and
- reduce impact on small business.

The task force further recommends that the principles underlying the Regulatory Impact Statement policy apply to the reviews, and that Regulatory Impact Statements be

[1] The Task Force recommends that this review be carried out after the province has responded to federal species at risk legislation.

prepared where feasible. For example, it may not be useful to prepare an RIS for eliminating signatures on particular forms. However, we believe an RIS would be useful to delineate the options, and implications, of harmonizing definitions related to coloured fuel and agricultural vehicle licensing.

The Strategic Review Policy requires ministries and agencies to develop Review Plans which outline the scope, timeframe and consultation process for each review. We will examine the Review Plans, and may make additional recommendations. However, the reviews are the responsibility of the various ministries and agencies, and it is important for interested parties and the public to hold them accountable for carrying out the reviews. The reviews and reports on progress, as well as on the impact of any changes made, will be included in the performance plans annual reports required by the Budget Transparency and Accountability Act.

The task force emphasizes that the strategic review is ongoing, and must be ongoing, if it is to be successful. We will be making additional recommendations over time, for example, on submissions that have been deferred in this round. We also believe that the reviews need to be based on the issues identified by those affected by regulations and their enforcement. Therefore, we encourage business and others to continue to send in ideas. Suggestions may be sent at any time:

- electronically, through the streamlining website www.streamline.gov.bc.ca;
- by fax, to 250-387-9099; or
- in writing, to: Streamlining Initiative, Room 109, 617 Government Street, Box 9417 Stn. Prov. Gvt., Victoria, B.C. V8W 9V1.

Recommendations for Changes to the Regulatory Impact Statement Policy

The task force monitors compliance with the RIS policy. On our behalf, the Ministry of Finance and Corporate Relations commissioned Perrin, Thorau & Associates Ltd. to assess the quality of a sample of RISs and identify changes that would help make the Policy as effective as possible.

Perrin, Thorau's full report is attached in Appendix 6. While implementation of the policy is still in an early phase, we believe the findings confirm that British Columbia is on the right track with regard to regulatory impact analysis. Indeed, the report suggests that the initiative should become increasingly effective over time. However, this is also a good time to assess progress and to make some improvements. In our view, two findings are fundamental to ensuring high-quality RISs, and to achieving the policy goal of promoting informed and accountable regulatory decisions. These findings are:

- **There is a correlation between the quality of RISs and their use in policy development and consultation.** In our view, this confirms that when RISs are used as intended, as tools for policy development and consultation, they are more likely to be of high quality and to contribute to informed policy decisions.

- **The RIS initiative has had a greater internal than external impact.** We are very pleased that the RIS Policy is affecting how the government operates, a result that is critical to the policy's success. However, we are concerned about the lack of awareness of the policy among those outside government. A cornerstone of the RIS Policy is that stakeholders, interested parties and the public hold ministries and agencies accountable for the quality of the RISs, and hence for regulatory policy decisions. The lack of outside awareness indicates a gap in accountability, which must be addressed.

The report's seven recommendations generally address these key findings, and we endorse all but one of the recommendations. Accordingly, we recommend that the government make the following changes to the RIS Policy:

1. Encourage the use of draft RISs in consultations.
2. Emphasize that ministries and agencies need to publicize RISs.

3. Include a list of RISs and abstracts (as in Appendix 7) in regular Streamlining communications.
4. Increase senior officials' familiarity with the RIS objectives and requirements.
5. Amend the criteria used by the BTF to recommend that an RIS be done, to include some consideration of the scope of the proposed change, as well as its significance.
6. Use RIS principles and, where appropriate, format for the strategic reviews of existing regulation.

The one recommendation that the task force has not yet endorsed is that the RIS format be changed to:

- replace questions in section headings;
- reduce the number of sections; and
- explicitly require options to be identified and the implications of all options analyzed.

The task force does not oppose the recommendation in principle. We agree that the format should contribute to high-quality RISs. However, we are concerned that the proposed changes could inadvertently diminish the importance of cost-benefit analyses and implications, such as the potential effect on competitiveness, which are particularly important to business.

For these reasons, we are consulting further on the proposed changes. Ministries and agencies have been invited to comment, and to identify any other changes to the RIS Policy that they would like considered. The task force will review this input before making our final recommendations to the government on changes to the RIS Policy and RIS format.

Highlights of Progress on Major Streamlining Projects

Our previous reports have appended an update on all the major streamlining projects we have endorsed or sponsored. In this report, a summary of project status is in Appendix 8. Here, we have highlighted only projects on which significant progress has been made or we would like to make specific comments. All projects can be reviewed in detail on the streamlining website. We commend ministries and agencies for their progress and strongly recommend they continue to advance these important projects.

I. Construction Industry Request for a Commissioner for Taking Affidavits

Background: Construction industry representatives raised concern over the growing burden associated with filing statutory declarations – particularly those pertaining to construction contracts and the *Skills Development and Fair Wage Act*. Under section 56 of the Evidence Act, the Attorney General is empowered to make appointments where lawyers or notaries public are not readily accessible or as a convenience to the public. The Ministry of Employment and Investment recommended establishing a Commissioner for Taking Affidavits on behalf of the construction industry. The BTF supported this recommendation.

Status: Complete. A Commissioner for Taking Affidavits has been appointed from each of the province's four construction associations. The Ministry of Employment and Investment will monitor the impact of these four appointments, paying particular attention to whether the appointments are meeting the needs of British Columbia's small, rural communities.

BTF Response

The BTF is pleased that this project is complete and with early positive reports. We look forward to the construction industry's comments on the usefulness of these changes, and to the Ministry of Employment and Investment's report on the needs of small, rural communities.

II. Electronic Service Delivery

On March 2, 2001, the BC Government announced *BC Connects*, the first phase of its electronic services portal. It is part of the *InfoSmart* framework government established to improve the way it works and delivers services to the public using information technology. The portal is designed as an easy-to-use entry point improving access to government services available on the Internet. *BC Connects* is available through the government's main web site at www.gov.bc.ca. Currently, there are over 180 services available at this site including making a ferry reservation, downloading instructions for applying for a birth certificate, and booking a campsite.

Planned upgrades to this portal will make digital access to government even easier and more convenient. The *BC Connects* portal will be upgraded regularly, as more services and functions are available. Phase Two of *BC Connects*, planned for late fall, will allow

citizens to register for multiple services and will introduce cross-government authentication for some services.

The InfoSmart Project Office will manage the development of Phase II, co-ordinate a number of government shared *InfoSmart* development projects as well as act as secretariat for the *InfoSmart* Implementation Committee that has been charged with managing the corporate InfoSmart Fund.

The *Electronic Transactions Act* (ETA) received Royal Assent on April 11, 2001 and will come into force by regulation as soon as possible. The ETA was based on model legislation developed by the Uniform Law Conference of Canada. This legislation basically gives electronic documents and signatures the same status as those in paper form and is critical to enabling and promoting e-commerce and e-government in the province.

BTF Response

The BTF strongly supports the promotion of electronic service delivery in government, as well as any activity that will facilitate electronic commerce in the province. BC Connects and the Electronic Transactions Act are consistent with these goals.. The task force wishes to be advised of proposals for legislation in British Columbia concerning the protection of personal information in the private sector.

III. Environment

Update on Developing New Pollution Prevention Regulations:

The Ministry is working with a multi-stakeholder advisory committee to provide the Minister with recommendations on how P2 should be implemented. The committee's report is expected by mid-2001.

Work on depermitting regulations continues. The new Municipal Sewage Regulation came into effect on July 15, 1999. A new Organic Matter Recycling Regulation, which will encourage composting of municipal organic wastes and beneficial use of municipal sewage biosolids, has been drafted. It is expected that other performance-based, industry-depermitting regulations will be developed within the next 12 to 24 months.

Update on the Review of the Contaminated Sites Regulation:

The second stage comprehensive Contaminated Sites Regulation review and amendment is now complete. As part of the review, the multi-stakeholder Contaminated Sites Implementation Committee advised on specific proposed amendments, with the following key items recommended:

- Exempting local government zoning or rezoning land from the requirement to submit a site profile if it does not intend to develop land;
- Exempting the duty of a person to submit a site profile if building demolition does not involve any disturbance of soil;
- Clarifying the size of a site, which is used to determine the fees payable for various activities and functions performed by staff;
- Expanding the functions performed by environmental consultants on the Expert Roster to speed up determining if a site is contaminated and if relocating contaminated soil is acceptable;
- Providing for reduced fees when ministry staff rely on the advice of members of the Expert Roster in deciding if a site is contaminated or if a Contaminated Soil Relocation Agreement should be approved;
- Introducing new, flexible, health-based standards endorsed by medical health officers for wide-area sites;
- Deleting the requirement for verbal (but not written) notification to regional staff when beginning independent remediation of a site;
- Introducing new requirements for the notification by site owners of neighbouring land owners about the likely or actual migration of contaminants onto the neighbour's site;
- Increasing the fee a local government may collect for processing a site profile to $100 from $50;
- Updating the environmental quality standards in Schedules 4 through 7 based on the latest scientific information.

The target date for an Order in Council package going to Cabinet is spring/summer 2001.

BTF Response

The BTF supports the early implementation of the Organic Matter Recycling Regulation. The task force also supports the implementation of the recommendations arising from the review by the Contaminated Sites Implementation Committee (CSIC), but recommends that the entire regime (including legislation) be reviewed, starting with first principles and a careful assessment of trends in other jurisdictions. The restriction of the CSIC review to regulations has been a major limitation since many of the problems and inefficiencies in the system stem from the underlying legislation rather than the regulation.

This project was previously titled "Highways Development Approval Process Review." The title change reflects the broader nature of the project. The task force was concerned with what appeared to be a lack of progress in this project, and asked the Ministry of Transportation and Highways (MoTH) for the following detailed update:

Background

What is the Development Approvals Program?
To subdivide land in British Columbia, an applicant must first submit a subdivision plan to an approving officer, who determines whether the plan meets all the requirements set out in legislation, regulations and local government bylaws for the subdivision of land.

Jurisdiction over the subdivision of land is divided between municipalities and the province. Subdivision applications within municipal boundaries are reviewed by approving officers appointed by municipal councils. Applications for subdivision in rural or unincorporated areas of the province are reviewed by provincially appointed approving officers.

MoTH is responsible for approving subdivisions in rural areas of the province. The process for gaining approval to subdivide in these areas includes a multi-agency referral process, designed to allow relevant ministries and agencies to provide comment and approval on proposed subdivisions.

Program Review

In 1998, MoTH initiated a review of the Development Approvals Program, which the BTF endorsed as part of the Streamlining Initiative.

The objective of the review is to identify opportunities to make the approvals process more efficient and less time consuming for applicants and government staff.

Action to Date

Review of the Development Approvals Process has involved two phases:

1. **Initial Program Review by the Ministry of Transportation and Highways.**

   Key Issues Identified:

- Length of time to approve subdivision applications is too long.
- Process is too complicated (requires streamlining and increased co-operation amongst agencies involved).
- High costs to developers due to time delays.

2. **Detailed Assessment of Program and Development of Options for Improvement.** Based on consultation with rural, regional and urban developers, government ministries, referral agencies, provincial approving officers and ministry staff, three options for improving the development approvals process have been developed.

Option I.

- **Status Quo with minor revisions.** Improvements to existing program without imposing additional financial or human resource constraints on the ministry.

Option II.

- **Redesign the existing subdivision approvals program.** MoTH would provide a one-stop shopping window for managing the development approvals process. This concept relies on the adoption of a referral system that would see only the most complex applications being referred to ministries and agencies for review. Ministry staff, using criteria and benchmarks provided in advance by relevant agencies, would review most applications.

Option III.

- **Fundamental redesign of the process.** Integrate administration of development approvals under a single piece of legislation and establish an independent provincial agency to deliver the program.

In summary, the options range from easiest to implement (including time commitment, cost and complexity) to most difficult. A consistent thread to all the options is the need to recognize that effective change must involve a new provincial approach to program delivery. All government ministries and agencies involved in the approvals process will be required to change the way they do business in order to make program delivery more efficient.

Next Steps

Phase three of the program review involves developing specific proposals and implementation plans for both immediate and long-term change. The overall strategy is to deliver up-front operational changes to the program, while continuing to work on details around more fundamental program change.

Implementation of Short Term Change (April 2001 – March 2002)

MoTH will develop a business plan to implement changes to Development Approvals Program, including actions to improve response times, improve internal and external communications, pilot the transfer of the development approvals program to a regional district, provide improved training, and provide quality assurance.

- A pilot project, which began in January 2001, provides additional service to developers who are willing and able to pay for additional services of ministry engineers. Developers who choose to obtain additional direct service from ministry engineers are charged additional fees to cover staff time. However, participation in the pilot project is optional. Applicants may choose to go through the current system where select time is provided by ministry engineers free of charge.

  This pilot project is intended to identify the benefits and drawbacks to a development approvals program with a fee for service component.

Planning and Implementation of long-term Change (April 2001 – May 2002)

- Between spring and fall 2001, detailed proposals and implementation plans for long-term, fundamental program change will be developed.

- Pending government approval of the resulting specific proposals and implementation plans, major revisions to program structure and delivery could be tentatively scheduled to begin in spring 2002.

BTF Response

The BTF is reassured that there has been some headway made in this project. The task force supports the project and MoTH's efforts to pilot streamlining options in the short term, as well as to embark on an overhaul of the development approvals system. We strongly encourage the ministry to fast track this project.

V. Local Government Streamlining

Safety Legislation: In spring 2000, the Ministry of Municipal Affairs published a near-final draft of a new Safety Standards Regulation Act (SSRA), which would consolidate and update legislation from five statutes. The SSRA is intended to sustain public and worker safety while delivering services as efficiently as possible. Many of the comments raised questions about matters that would be addressed in the regulations rather than the statute. To make the proposed new regime as clear as possible, the Act and the Regulations will be drafted and forwarded together for consideration for the Spring 2002 legislative agenda.

BTF Response

The BTF supports this project in principle, but is aware of concerns being raised by parties who would be affected by the new regime. The task force commends the Ministry of Municipal Affairs for responding to these concerns and the task force will continue to monitor progress and the reaction of interested parties.

VI. Single Business Number

The Single Business Number (SBN) refers to the use of the federal business number to replace the numerous identifiers that an estimated 400,000 BC businesses currently use to deal with government agencies in various levels of government. The Ministry of Small Business, Tourism and Culture (SBTC) is taking the lead in co-ordinating the five provincial agencies that have committed to work towards implementation of the SBN. The project partners include:

- Canada Customs and Revenue Agency (CCRA)
- The Consumer Taxation Branch (Ministry of Finance and Corporate Relations)
- The Liquor Distribution Branch (LDB)
- Consumer Services Office (Ministry of Attorney General)
- Workers' Compensation Board (WCB)
- Registrar of Companies (Ministry of Finance and Corporate Relations)

Status

To date, the project charter has been signed by all partner agencies, a draft communications strategy has been developed, a project intranet site has been developed, and a *preliminary* business requirements document has been developed.

Next Steps

In order to for the SBN project to proceed to the next phase, it is expected that the following steps will be taken:

- Hold a steering committee meeting to resolve outstanding management issues;
- Complete development of a specification document that more clearly outlines technical architecture, refines the project charter and establishes a preliminary budget;
- Collect input from all partners regarding costing;
- Develop a business case and seek Treasury Board approval for full SBN initiative; and
- Procure services for the development and provision of the required infrastructure and the associated integration with partner systems.

BTF Response

The BTF supports this project encourages the Ministry of Small Business, Tourism and Culture and the provincial partners to continue their efforts.

VII. Employment Standards

Update on Variances:

The task force invited the Director of the Employment Standards Branch to its February 2001 meeting to discuss the variance process under the Employment Standards Act.

The variance provisions allow employers to apply to the Employment Standards Branch to vary requirements to reflect actual employment conditions in the work world.
The most frequently requested variances are for exemptions from minimum daily hours and maximum hours of work. To be considered a variance must meet certain conditions, the three most critical of which are:

- The intent of the Act must still be met;

- A majority of the employees agree with the proposed variance; and
- The current complaint history of the employer must be "clean".

In 1999 – 2000, 474 variances were approved by the Employment Standards Branch. If a variance request is clear and within the authority of the Director to approve, it can be approved within two weeks of application. This applies to a majority of variance applications.

The number of variance applications has declined, principally because a number of sectors have been successful in working with government to develop changes in the Regulations to address their specific needs. Variances cannot be used to address every circumstance. However, variances and sector-specific regulations have been successful in tailoring employment standards to meet the needs of employers and employees in many sectors.

Complaint Backlog Management

In May 2000, the Employment Standards Branch received $1 million acquire resources to address the volume of complaints being faced by the Employment Standards Branch.

At that time there were 1104 files awaiting action throughout the province. As of February 19, 2001 there were 427 files are awaiting action, a reduction of 61%. There were also 638 files over 300 days being handled by Officers. Today there are 319 300-day old files, a reduction of 50%.

Currently there are 285 files awaiting assignment in Vancouver. Applying the Branch standard of a file taking no longer than two working weeks to be assigned for investigations –the backlog number adjusts to 252. To address these files, a number of actions are being taken, which will reduce the backlog by 150 files to 102. The remaining files will be managed through reassignment throughout the Branch.

The complaint volume has been steadily rising in Vancouver, with the result that in January 2001, complaints were up 28% over the number filed in June 2000. Province-wide, complaints are up 15% over the same period.

In summary, a 15% temporary increase in officer staffing has enabled the Employment Standards Branch to reduce the backlog by 61% and the over 300-day files by 50%, in

spite of a 15% increase in the number of complaints filed over the same period. Additional resources must be maintained if the backlog is to be eliminated.

BTF Response

The BTF appreciated the report provided by the Director of Employment Standards on the variance process and the efforts to address the backlog of complaints. The task force is encouraged by the progress reported and will continue to monitor developments.

Appendix 1.

2000-2001 Members of the Business Task Force on Regulatory Impact

Hon. Paul Ramsey, Chair	Minister of Finance and Corporate Relations
Hon. Gerard Janssen	Minister of Small Business, Tourism and Culture
Jock Finlayson	Vice President Business Council of BC
Abigail Fulton	Vice President BC Construction Association
John Halani	Chair, Ethno-Business Council
Lief Hansen	President, United Food and Commercial Workers Union Local 2000
Ken Higginbotham	Vice President Forestry and Environment Canfor Corporation
Lynne Kennedy	Councillor City of Vancouver
Laurie Kerr	Immediate Past Chair BC Chamber of Commerce
Mark Kingsbury	Executive Committee Council of Tourism Associations
Werner Knittel	Vice President BC Division Canadian Manufacturers and Exporters
Paul Landry	President and CEO BC Trucking Association
Lindsay Olson	Vice President Pacific Region Insurance Bureau of Canada
Suromitra Sanatani	Vice President BC and Yukon Canadian Federation of Independent Business
Steve Thomson	Co-ordinator BC Agricultural Council
David Vipond	Director, Advocacy and Technical Services, BCGEU

Appendix 2. Terms of Reference

2000/2001 BUSINESS TASK FORCE ON REGULATORY IMPACT

Streamlining Initiative

Mission:
To help create a regulatory environment that promotes economic prosperity and public protection through regulatory policy and administration that is seen as necessary, effective and fair.

Goals:
- Better (smarter) regulatory policy;
- Better (more balanced, efficient and effective) regulatory administration;
- Together minimising regulatory impacts and burdens, including managing and reducing the cumulative impact of regulation.

Business Task Force on Regulatory Impact Terms of Reference

The Business Task Force on Regulatory Impact is established by the Minister of Finance and Corporate Relations under section 4 of the Regulatory Impact Statement Act with the following terms of reference:

1. To advise the minister on regulatory policy and administration streamlining and other matters related to reducing the cost of doing business in British Columbia;

2. To advise the minister on which regulatory policy issues should be subject to the Regulatory Impact Statement requirements based on a review of the information provided by regulatory authorities in accordance with the *Regulatory Impact Statement Policies and Procedures*.

3. To advise the minister on a review of existing regulatory frameworks and operations to promote the goals of the Streamlining Initiative.

4. To report on progress.

Appendix 3. Summary of Streamlining Approach

The task force's mandate, and the streamlining initiative as a whole, is carried out through the following interconnected, five-star approach to streamlining:

Regulatory Impact statements

A major priority for the task force continues to be to promote smarter regulation. The *Regulatory Impact Policies and Procedures* require that a Regulatory Impact Statement (RIS) be prepared for major new regulatory policy. The purpose of the RIS is to help ensure that these decisions are informed and transparent. Therefore, an RIS documents the problem being addressed, the objectives of proposed regulatory policy, analysis of possible alternatives and their implications, costs and benefits, including but not limited to business implications, and consultation.

The task force gives advice on whether an RIS should be prepared for a particular policy proposal. This advice is based on a review of regulatory plans prepared by ministries and agencies. The plans are updated quarterly. The RIS must be made public when the decision is announced. They are posted on the streamlining website (www.streamline.gov.bc.ca).

Consultation and Streamlining proposals

The task force actively consults with those outside government to get streamlining ideas and invites suggestions at any time. Proposals can be sent electronically through the website (www.streamline.gov.bc.ca). Please click on "Have Your Say". Proposals can also be sent to the Streamlining Initiative, Room 109, 617 Government Street, Box 9417 Stn. Prov. Gvt., Victoria, British Columbia V8W 9V1, or faxed to 250-387-9099.

All suggestions are reviewed by the appropriate agency and by the task force, which also reviews the agency response. The government has adopted a reverse onus policy for these suggestions. The suggestion made, or an alternative solution to the problem identified, must be adopted unless there are policy reasons against doing so. The task force looks for concrete problems and proposals where changes can be identified and pursued.

Progress on the proposals can be tracked on the streamlining website.

Major Streamlining Projects

Based on themes that emerged from streamlining proposals, the task force has sponsored or endorsed about 20 major projects addressing key areas. Substantial progress has been made on some projects, including the liquor policy review and implementation and some aspects of one-stop business registration. However, the task force notes that significant work remains in other projects and strongly recommends that they be assigned a high priority. Details of each project can be tracked on the streamlining website.

Streamlining Legislation

Some streamlining changes require legislation in order to come into effect. The government introduced a streamlined approach for eligible amendments. To qualify for the streamlined approach, the amendments must streamline government operations or cut compliance costs without compromising the public protection objectives of the regulation. As a result, the legislation may not have broad impact, but the amendments are important to those affected, and collectively, they contribute to streamlining government and improving the regulatory environment.

Streamlining legislation that has policy implications proceeds through the regular government approval processes.

Review of Existing Regulatory Frameworks

The task force mandate includes advising on which existing regulatory frameworks should be reviewed. In the fall of 2000, the government implemented a Strategic Review Policy on the advice of the task force. The task force made its initial recommendations for priority review in March 2001 and will make additional recommendations from time to time.

Appendix 4. Policy for Strategic Review of Existing Regulation

Preamble

1.0 This policy sets out the Government of British Columbia's guidelines and procedures for the Strategic Review of Existing Regulation (Strategic Review).

2.0 The policy is based on recommendations made by the Business Task Force on Regulatory Impact (BTF) in its August 2000 Report as part of carrying out its mandate and terms of reference.

3.0 The BTF is appointed under the Regulatory Impact Statement Act. (RISA).

4.0 The policy is set by the Minister of Finance and Corporate Relations in accordance with the RISA.

Application

5.0 In this policy, regulatory authority and regulatory policy decision have the same meaning as the definitions in section 1 of the RISA.

6.0 In this policy, a regulatory framework includes the:

(a) legislation;

(b) regulations;

(c) administrative policy; and

(d) administration and enforcement operations that implement regulatory policy decisions.

7.0 The policy applies to all regulatory frameworks within the mandate of all regulatory authorities.

Purpose of the Strategic Review

8.0 The purpose of the Strategic Review is to apply the principles of the Regulatory Impact Statement to selected aspects of existing regulatory frameworks to:

(a) Confirm the necessity, efficiency and effectiveness of the existing regulatory policy;

(b) Repeal or replace outdated regulatory requirements;

(c) Increase regulated entity flexibility;

(d) Reduce paperwork burden;

(e) Reduce regulatory impact on small business;

(f) Clarify regulatory requirements;

(g) Improve administration and enforcement;

(h) Improve policy and administration co-ordination among regulatory authorities.

while maintaining or enhancing the necessary public protection purposes of regulatory frameworks.

Strategic Review Priorities and Review Plans

7.0 The BTF will provide advice, from time to time, to the Minister of Finance and Corporate Relations on which aspects of existing regulatory frameworks should be a priority for review.

8.0 The BTF will provide this advice to the Minster of Finance and Corporate Relations based generally on the following process:

(a) BTF members will identify possible priorities for strategic review taking into account the nature of proposals they have received from parties outside government;

(b) For each possible priority, regulatory authorities will provide the BTF information on:

(i) reviews already underway for the possible priority;

(ii) groups that would likely be consulted in a review of the possible priority;

(iii) feasibility and resource requirements for the possible priority;

(iv) any reasons why a possible priority should not proceed or should be deferred; and

(v) other aspects of the regulatory frameworks relevant to the possible priority the BTF should consider including in its recommendations.

(c) The BTF will consider this information in making its recommendations for review priorities to the Minister of Finance and Corporate Relations.

9.0 The Minister of Finance and Corporate Relations will set priorities for Strategic Review based on the advice of the BTF.

10.0 When the Minister of Finance and Corporate Relations informs a regulatory authority that a priority has been set, the regulatory authority will provide the BTF with a brief Strategic Review Plan for that priority that includes:

(a) a timetable for the review;

(b) how stakeholders will be consulted; and

(c) how the impact of the results of the review will be assessed.

Strategic Review Reporting Requirements

11.0 Regulatory authorities must include any Strategic Review Plans in the annual Performance Plans required under the Budget Transparency and Accountability Act (BTAA).

12.0 Regulatory authorities must include a report on the progress and impacts of any strategic reviews in the Annual Reports required under the BTAA.

Strategic Review Assessment

13.0 Based on the information contained in the Performance Plans and Annual Reports, the BTF will recommend to the Minister of Finance and Corporate Relations adjustments to:

(a) strategic review priorities;

(b) strategic review schedules;

(c) the content, management and implementation of the Strategic Review Policy.

Appendix 5. Submissions for Strategic Review

In reviewing the submissions, the BTF considered:

- whether the review at this time would duplicate or complicate a review that was already under way;
- whether the issue is within the mandate of the BTF (i.e., not tax policy);
- the potential impact of a review; and
- whether the proposal was specific enough to be understood and accomplished within a reasonable time.

Suggestion for Review	BTF Decision
PROCESSES:	
Winery Licensing Process: Complexity of Procedures for securing endorsement of winery licence. Procedure seems similar to cumbersome procedures now in place for "J" licences. Request for integrated application and approval process involving provincial ministries and local governments.	***Defer. Additional review now would detract from implementation of Liquor Policy Review.***
Agricultural Land Reserve Process for Land Parcel Removal: Review ALR to determine whether it can be changed in ways that will allow more land to become available for other economic uses. For example, consideration should be given to developing an expedited system for removing specific land parcels from the ALR. Need for objective, transparent criteria.	***Defer.***
Employment Standards Act: Simplification of statutory holiday pay calculation.	***Recommended.***
One-Stop Shopping: Provide one-stop shopping for A plates (for agricultural vehicles) and coloured fuel (for agricultural purposes.	***Recommended.***
Development/Manufacturing Plant: Cross-jurisdictional comparison of regulatory requirements and administration for building a new manufacturing plant (mid-size – 80-100 employees, $5-20 million in sales). Example could be plastics	***Defer.***

(injection moulding/high tech related). Compare at provincial and municipal levels in B.C., Alberta, Washington State.	
Licensing: Dual licensing required for security alarm installers (security alarm and electrical contractor).	***Decline. Ministry of Attorney General has reviewed.***
Red Tape Canvas: Canvas government agents and front-desk staff in selected areas to identify red tape that is hindering their ability to carry out responsibilities and respond effectively to the public.	***Recommended.***
Employment Standards: Simplifying process for obtaining variances under the Act and regulations; and whether to exempt more businesses or industries and occupations from the strictures of the legislation (e.g., as already done in case of high-tech professionals).	***Defer.***
WCB: Pressure WCB to consider costs and benefits in regulatory decisions, to take more seriously the issue of compliance burden and to operate more efficiently.	***Defer.***
Weigh Scales/Commercial Trucking: Weigh scale enforcement officer training/ one-stop fee collection.	***Declined. ICBC process underway.***
Permitting Process Review: Look for opportunities for liaison, one-stop shopping and delegation of approvals.	***Defer.***
TAX POLICY	
Tax Policy (Winery Taxes - Tax Treatment): Review of tax regime for wineries. BC Wine Institute requests that wineries be treated as agricultural enterprises for tax purposes.	***Decline. Beyond BTF mandate and referred to budget process.***
Tax Policy (Winery Taxes): PST levied on wine barrels. BC Wine Institute requests that PST be removed from wine barrels on grounds they are consumable in wine production.	***Declined. Beyond BTF mandate and referred to budget process.***
TAX ADMINISTRATION	
Tax Administration: Review establishing same deadlines for	***Declined. Review***

GST and PST submissions.	***previously completed by ministry.***
Streamlining Tax Administration: Tax administration: look for specific opportunities to reduce compliance burden by making greater use of information technology and the Internet; coordinating with federal taxes; reducing the number or frequency of filings; generally reducing the quantity of paperwork associated with provincial taxes. Review other jurisdictions. Long term issue: whether and how to integrate provincial retail sales tax regime with federal GST.	***Defer. Focus on corporate taxes to be considered.***
REPORTING/FORMS	
Winery Reporting Requirements: Onerous reporting requirements for wineries. Increased reporting requirements related to winery licensing. Reports must be filed with LCLB, LDB, Revenue Canada and the BC Wine Institute. Would like coordinated reporting format. Development of integrated data collection and reporting system for the wine industry.	***Defer.***
Form Review: Ministries should review their forms to ensure that the information being collected is necessary and try to eliminate or merge forms where possible.	***Recommended with retail sector as pilot.***
Tombstone Data Coordination: Government ministries and agencies should coordinate tombstone data to avoid business having to provide the data many times.	***Defer, pending progress on single business number and new Company Act.***
Signature Requirements: Review signature requirements and eliminate where possible. Streamlines and assists e-business and e-government.	***Recommended***
MODERNIZATION	
Insurance: Revisions to Uniform Life and Accident and Sickness Insurance Acts (parts 3, 5 of BC Insurance Act) to	***Defer.***

harmonize with modernization of legislation underway or beginning in Atlantic provinces, Alberta and Saskatchewan. Has been more than 30 years since the uniform acts were revised. Changes are required to correct deficiencies in wording, eliminate variations from uniformity with other statutes, modernize or update to satisfy marketplace demands for new or different industry products and practices, including e-commerce transactions.	
Motor Carrier Commission: Modernize and streamline passenger carrier regulation.	***Declined. Motor Carrier Commission working through taxi and bus industry advisory committees.***
Motor Carrier Commission (Regulation of Taxis): Municipal regulation of taxis leads to situations where empty taxis are prohibited from picking up passengers in municipalities where they do not hold a licence.	***Declined. Refer to Motor Carrier Commission for pursuit with taxi advisory committee.***
SRO Legislation: Many SROs have outstanding requests for legislative amendments that staff resources or the legislative agenda (or both) have not been able to accommodate. Could help efficiency and effectiveness of industry regulators/ potentially contribute to professional accountability, streamlining large regulatory sector and potentially reducing need for some other regulation.	***Defer.***
Insurance: Section 79 of the Financial Institutions Act. Prohibits rebating. Archaic provision originally aimed at protecting solvency of life insurance companies. Other provisions address this more effectively. Now being used primarily in the property insurance side. Arguably hinders market and increases costs.	***Recommended.***
Review Legislation for Provisions preventing Home Office: Travel Agents Act prevents licensed travel agents from working at home. There may be other statutes that have similar provisions that no longer reflect home-office ability.	***Recommended***
Overhaul Wildlife Act: Outdated provisions hinder guiding and outfitters sector.	***Recommended***

REQUIREMENTS/STANDARDS	
Wine Standards: BC Wine Institute urges government to join with it to evaluate the current wine standards system and develop a more effective implementation program. BCWI says it does not have all the tools and funding necessary to conduct its operations with respect to administration and enforcement of wine standards.	***Declined. Ministry of Agriculture, Food and Fisheries pursuing with the wine industry.***
Regulation of Eyeglass Dispensing in BC: General review of the administration, interpretation and enforcement of existing regulation by SROs to make sure appropriate, efficient and effective.	***Declined. Referred to Ministry of Health review process.***
Motor Dealers Association: Request for SRO status.	***Declined. Referred to Ministry of Attorney General initiative under way.***
Local Government Development Charges: Review of local charges across municipalities and impact on housing market, particularly housing starts. Wide range of total charges for standard single detached house: $19,330 for Surrey; $2,703 for Burnaby (1997 research).	***Defer.***
Employment Standards (hours of work): Minimum daily paid hours.	***Defer.***
Barriers to Improved Environmental Performance (Health Act Sewage Disposal Regulation and other barriers): Regulation acts as a barrier to innovative waste-water treatment systems (e.g., CK Choy Building at UBC). Further barriers had it been in municipality and under building code. Hydroxyl Systems issue. Review regulation and its administration.	***Declined. Referred to Ministry of Health existing review of sewage disposal regulation .***
Barriers to Improved Environmental Performance (Forest Act Section 64 – Minimum Cut Control): Requirements may inhibit industry ability to respond effectively to market demand. Forest Council Certification requires reduced annual cut. Reduced cut may not be allowed under section 64 requirements.	***Declined. Referred to Ministry of Forests for referral to Certification Advisory Council***

WCB: Barriers to Improved Environmental Performance: WCB regulation of firetruck personnel. Review WCB-imposed minimum staffing levels for trucks, which effectively require larger trucks and roads with wider turning radii. Restricts innovative sustainable community designs for subdivisions and increases impermeable surfaces that adversely affect runoff.	***Declined. WCB advises that it does not impose minimum staffing levels.***
Barriers to Improved Environmental Performance: Recommend general focus of a review on regulatory barriers that may be a barrier to improved environmental performance.	***Defer.***
Limitation Period. Reduce limitation period from 30 to 10 years.	***Declined. Ministry of Attorney General already reviewing.***
Environmental Stewardship: Regulation of dry-cleaners' handling of chemicals.	***Declined. Ministry of Environment, Lands and Parks working with industry.***
Franchise Protection Legislation: Request for franchise disclosure legislation to protect franchised grocers (and other franchisees) based on Ontario legislation passed in May 2000. Considered a red tape initiative in Ontario.	***Deferred.***
INTERJURISDICTIONAL COORDINATION	
Interjurisdictional Streamlining: Examine where federal/provincial regulations are inconsistent or create gaps.	***Defer.***
Interjurisdictional Streamlining: Establish a UBCM/Business group (including regional districts) to identify differences in provincial/municipal law and requirements.	***Defer.***
SECTORAL REVIEW	
Ministry of Forests Cost Driver Initiative: Recommendations made in the Cost Driver Initiative with the Ministry of Forests.	***Declined. Ministry of Forests work underway as part of streamlining project.***

Sectoral Regulation Review: Review regulation that applies to specific sectors (e.g., construction industry, hospitality industry, mining industry).	***Defer. No sector came forward.***
OTHER	
BC Business Summit Recommendations: Implement recommendations made by the BC Business Summit.	***Defer.***

Appendix 6.

REGULATORY IMPACT STATEMENT REVIEW

FINAL REPORT

Prepared for: Ministry of Finance and Corporate Relations and Business Task Force on Regulatory Impact

Prepared by: Perrin, Thorau & Associates Ltd.

February 1, 2001

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Purpose

Perrin, Thorau and Associates Ltd. has been retained by the Ministry of Finance and Corporate Relations at the request of the Business Task Force on Regulatory Impact (BTF) to review Regulatory Impact Statements (RISs) published between January 1 and October 31, 2000.

The *Regulatory Impact Statement Act* (RISA) took effect in mid-1999, requiring that a RIS be published when certain regulatory policy measures are announced. Although the RIS requirement has been in place for a relatively short time, the BTF felt that a review of RISs completed to date would be useful to highlight any aspects of the RIS initiative that could be improved to make RISs more effective. In addition, the BTF is considering recommending that government conduct reviews of areas of regulatory policy and is interested in whether the RIS can be used in such reviews.

Specifically, the purpose of the review is to determine whether:

- the RISs comply with the requirements of the RISA, the RIS Policy and the RIS Guide;
- the RISs are fulfilling the public policy objectives of the *Regulatory Impact Statement Act* (RISA); and
- any improvements can be made to the content or format of the RIS Policy and RIS Guide to improve RIS effectiveness.

A two phase process has been used to undertake the review. In the first phase, all 23 RISs published in the period January 1 to October 31, 2000 were reviewed to highlight trends and to provide a basis for recommending a sample of RISs to be considered in detail. In Phase II of the project, a sample of RISs approved by the BTF were reviewed in detail, including undertaking interviews with government officials and external interested parties to obtain their views on how the RIS initiative could be improved.

Background

In May, 1998 the Minister of Finance and Corporate Relations established the BTF as a forum for business, labour and the provincial government to reduce the cost of doing business in British Columbia. One of the focuses of the BTF was the costs imposed on the economy by government regulation, with the objective of regulating smarter so that the benefits of government regulation can be achieved with less economic cost.

The BTF began by consulting widely. Of particular concern to the BTF was the perception among many of those consulted that major regulatory policy decisions are sometimes made without the benefit of full information, particularly about the economic implications of the decision. As described in the Regulatory Impact Statement Guide[2], the BTF concluded that:

> the [government's] decision-making process should:
>
> - be transparent and provide for accountability;
> - ensure that decisions are made in the context of reasonably comprehensive information about implications;
> - encourage effective consultation;
> - encourage the consideration of alternatives to regulation and alternative types of regulatory provisions; and
> - not paralyze government decision-making.

For the purpose of this review, the foregoing is considered to be the public policy objective of the RIS.

The BTF recommended that legislation be passed requiring that RISs be prepared and made public. RISs were intended to both encourage a government decision-making process consistent with the principles stated above and to demonstrate that these principles have been applied.

The basic idea is that published RISs help to hold government accountable for the decisions it makes, creating a powerful incentive to ensure decisions are well-informed.

The BTF recommended that RISs should have the following key features, as described in the RIS Guide:

- The Regulatory Impact Statement is a brief written report outlining the impact of significant regulatory policy proposals on the economy and business.
- The report must answer a checklist of 11 questions[3] to ensure that:
  - the objective of the policy is clear,
  - there is meaningful consultation with interested parties,
  - alternatives are considered and

[2] www.streamline.gov.bc.ca/RIS/guide.htm

[3] See Appendix B for a list of the 11 questions.

- impacts, costs and benefits are evaluated and compared for feasible alternatives.

- The Regulatory Impact Statement must be prepared by the government agency responsible for the regulatory policy proposal and must be made public when the decision is announced.
- The Regulatory Impact Statement is not intended to fetter government's decision-making power, just to provide certain information.
- Although the requirement for a public report only applies to "major" regulatory policy proposals, the *Regulatory Impact Statement Act Policies and Procedures* state that it is expected that the spirit and intent will be applied to all regulatory policy decisions.
- Consultation with interested parties should include consultation with front-line operational staff of government in addition to external interested parties. A part of the Regulatory Impact Statement deals specifically with staff consultations.
- The *Regulatory Impact Statement Act Policies and Procedures* require all major regulatory policy initiatives to be subject to mandatory review after a reasonable period of time, enforced through the inclusion of review and sunset provisions.

Although the specific requirement is for a report, the more general requirement is for rigorous policy work to be done on regulatory policy issues with the results of that policy work to be provided to decision-makers before the regulatory policy decision is taken, and to the public when the decision is announced."

For the purposes of this review, this is considered to be the set of basic requirements each RIS is expected to meet.

There is an important point that should be noted – even though the RIS arose from a forum that concentrates on the cost of doing business in British Columbia, the RIS does not focus exclusively or even mostly on business implications. Rather the RIS requirements are that all of the implications, costs and benefits associated with various policy options be addressed to show that the decision-makers have all the relevant information to make decisions that invariably involve difficult trade-offs.. Implications for business need to be included because regulatory measures almost always affect business directly or indirectly, but the business implications should be only included as part of a broad analysis of social, economic and other implications.

The requirement to produce RISs took effect in mid-1999. Since the requirement was introduced there has been an ongoing training program, based on a "train-the-trainers" model.[4] In addition, the Ministry of Finance and Corporate Relations has continued to provide training in the RIS, as well as in specific topics such as effective consultation and cost/benefit analysis.

It should be noted that many of the RISs produced during the year 2000 were the first efforts of the various agencies and of the individuals charged with the task of producing an RIS. It would not be surprising then if producing that first RIS was something of a learning experience which would then be applied to future RISs.

In addition, many of the decisions for which RISs were produced were the result of policy development and consultation undertaken prior to the introduction of the RIS requirement. While those involved are encouraged to develop the RIS as an integral part of the entire policy development process and even to use draft RISs as consultation tools, that clearly was not possible in many cases, where the policy development cycle predated the RIS implementation. One would expect it to be more difficult to draft an RIS that meets all of the requirements when the requirements were not in place during much of the policy development process.

Given the fact that the RIS requirement has only been in place for about 18 months, some may argue that it is too early to review the effectiveness of the measure. One would expect such a measure to become increasingly effective over time as those involved gain experience and are increasingly able to incorporate the RIS requirements into their policy processes. Therefore, it may be too early to determine whether the measure has had much impact on government decision-making and the perception of government decision-making.

Nevertheless, with over 20 RISs produced in 2000, it should be possible to determine whether the specific RIS requirements need to be adjusted in order to make RISs more useful. That is the reason that this review has been undertaken at this time.

Phase I – Initial Review of All RISs

Nature of the Review

[4] That is, first providing training in RISs to a few policy analysts in most ministries and agencies, who then provide training more extensively within their ministries and agencies.

The Phase I review of RISs was a subjective review of the RISs to determine to what extent they meet the general requirements described above. According to the RIS Guide, to meet the requirements the RIS must demonstrate the following:

- the objective of the policy is clear,
- there has been meaningful consultation with interested parties,
- alternatives have been considered; and
- implications, costs and benefits have been evaluated and compared for easible alternatives.

Therefore each RIS has been reviewed to determine how well it meets the RIS requirements under the following headings. Note that this is not a review of the policy development process, just a review of the written RIS.

Significance – Not specifically a RIS requirement but included as a gauge of the overall scope of interest in the measure. A measure that affects only part of a single industry is rated "Narrow." A change to an existing regulatory measure that affects all of an industry or parts of several industries is rated "Moderate." A major new regulatory measure or a change to an existing regulatory measure that affects most or all businesses in the Province is rated "Wide." Although this scale is used, it is recognized that even though only part of a single industry is affected, the overall impact could be large while if everyone in the province were affected, the overall impact could still be small. This is not an assessment of the overall impact but rather a measure of how wide the potential community of interest would be.

Objective – Is the public policy objective clearly defined? If the objective is not stated or is an administrative objective (e.g. change the legislation) rather than a public policy objective (e.g. improve public safety) it is rated "Poor." If the objective is discussed but left implicit, it is rated "Adequate." If the public policy objective is clearly articulated it is rated "Good."

Options – Are feasible options identified? If there are no options identified it is rated "Poor." If options are identified but obvious options omitted, it is rated "Adequate." If obvious options are identified it is rated "Good."

Implications – Are the implications described? If implications are not described or important implications are omitted, it is rated "Poor." If implications are only described in detail for the chosen option, it is rated "Adequate." If

implications are presented in reasonable completeness for the chosen option and the other options, it is rated "Good."

Consultation – Is there evidence of reasonable consultation? If consultation is not discussed or there is simply a statement that there has been consultation, it is rated "Poor." If there is sufficient description to determine that there has been consultation but not to understand the process used or whether and how the consultation had an impact on the final decision, it is rated "Adequate." If the consultation is described, is reasonable and the extent to which the consultation affected the final outcome described, it is rated "Good."

Readability – Is the RIS clear and easy to understand? RISs are rated "Poor," "Adequate," or "Good" based on the consultant's subjective opinion.

Phase II – RISs recommended for further review have been designated with a "YES." The intention was to select a group with a variety of levels of significance, a variety of lead agencies, a variety of types of regulation including labour regulation, natural resource/environmental regulation and consumer protection/financial regulation and varying qualities of RIS.

The Table 1 summarizes the results of the Phase I analysis.

Measure	Significance	Objective	Options	Implications	Consultation	Readability	Phase II
1. Collection of Fishing Assessments – WCB	Narrow	Good	Poor	Good	Good	Good	**YES**
2. Fin Aquaculture Escape Management – MAFF	Wide	Poor	Adequate	Poor	Poor	Good	**YES**
3. Wood Residue Burner Fee Rebate – MELP	Moderate	Adequate	Adequate	Adequate	Good	Adequate	
4. Minimum Wage – MoL	Wide	Good	Good	Good	Good	Good	**YES**
5. Government Training Accord – MAETT	Moderate	Poor	Poor	Poor	Adequate	Good	
6. Building Envelope Renovation – MSDES	Narrow	Good	Adequate	Adequate	Adequate	Adequate	
7. Agrifood Choice and Quality Act – MAFF	Moderate	Good	Good	Adequate	Adequate	Good	
8. Forest Act Designated Areas – MoF	Narrow	Poor	Poor	Poor	Poor	Good	**YES**
9. Heart Disease in Firefighters as an Occupational Disease – WCB	Narrow	Poor	Poor	Adequate	Adequate	Adequate	
10. Residential Tenancy Act Amendments – MAG	Narrow	Adequate	Poor	Adequate	Adequate	Good	
11. Licensing Silvaculture Contractors – MoL	Moderate	Good	Adequate	Good	Adequate	Good	
12. Maternity/Parental Benefits – MoL	Moderate	Good	Good	Good	Adequate	Good	
13. Cost of Consumer Credit Disclosure – MAG	Moderate	Good	Adequate	Good	Good	Good	**YES**

Measure	Significance	Objective	Options	Implications	Consultation	Readability	Phase II
14. New Home warranty Disclosure – MSDES	Narrow	Good	Good	Good	Adequate	Good	
15. Regulation of Mortgages – FICOM and BC Sec. Comm.	Moderate	Adequate	Good	Adequate	Good	Good	
16. Bladder Cancer in Aluminum Smelter Workers as an Occupational Disease – WCB	Narrow	Poor	Poor	Poor	Adequate	Poor	
17. LDB Listing of Brewpub Products – MSBTC	Narrow	Poor	Good	Good	Good	Good	
18. Dam Safety Regulation – MELP	Narrow	Good	Adequate	Adequate	Good	Good	
19. Sensitive Streams Designation – MELP	Moderate	Adequate	Poor	Poor	Good	Adequate	**YES**
20. Islands Trust Natural Area Tax Exemption – MMA	Narrow	Good	Adequate	Adequate	Adequate	Adequate	
21. Local Government Planning & Land Use – MMA	Moderate	Good	Poor	Adequate	Good	Good	
22. Employment Standards Regulation of Silviculture - MoL	Moderate	Good	Adequate	Good	Adequate	Good	
23. Taxi Industry Regulatory Reform – MoTH	Moderate	Poor	Adequate	Adequate	Poor	Poor	

Observations Based on Phase I

The Phase I Review has provided some insights into how well the RIS policy is working to date, summarized as follows:

- There are some strong RISs in the group that can be used as examples of what a good RIS can be. Most of the RISs that fair best in this analysis are those where the RIS was used as a consultation tool and prepared as an evolving document throughout the policy development and consultation process;
- Several of the RISs related to issues that were already well into the policy development process when the RIS requirement was put in place, so there was little scope for using the RIS requirements to guide the process;
- Overall there are relatively few RISs that meet all of the requirements. That does not mean that the decision-making process was flawed, only that the written RIS did not fully document all of the required elements. While not surprising during the first full year of implementation, this suggests that adjustments to the initiative may be needed. Phase II allows this to be explored more fully;
- There seem to be several RISs in the sample that do not apply to regulatory measures, such as the two RISs dealing with occupational diseases (numbers 9 and 16 on the attached table), the Government Training Accord (5) and the Islands Trust tax exemption (20). Perhaps because these are not really regulatory measures, it seems to have been difficult for the written RISs to meet the RIS requirements within the established format. This suggests that changes to the format should be explored to make the RIS easier to use and less sensitive to whether the subject of the RIS is a regulatory issue or another type of public policy issue;
- Several RISs suffered because the objective was only stated in administrative terms and the reported analysis also focused on administrative issues (e.g. the stated objective is to enact legislation or put a regulatory regime in place, rather than to achieve an outcome such as increase public safety or environmental quality). Focus on an administrative rather than a public policy objective makes the RIS difficult to complete well since a good RIS relies heavily on the definition of the problem or objective as the cornerstone of the analysis.
- Reporting on the identification and analysis of options seems to be a particularly challenging requirement of the RISA and RIS Policy.
- Few RISs included any quantification of implications at all and none attempted a broad quantification of implications. The expectation is that that for certain types of implications, such as economic and fiscal implications, usually it should be possible to undertake quantitative analysis and without that analysis the credibility of the RIS

may suffer. However, there are other categories of implications that do not lend themselves as well to quantitative analysis and there is no expectation that quantitative analysis will be done for all implications. In fact, when it is difficult to quantify implications, efforts to do so can also damage the credibility of an RIS. However, in this sample a better balance could have been achieved with some quantitative analysis in most cases.

Phase II – Detailed Review of Selected RISs

Nature of the Review

Phase II of the review was to seek input from those responsible within government for selected RISs and relevant external stakeholders. The purpose was to explore the experience of those inside and outside government as a way to identify possible improvements to the initiative. While the specific RISs chosen for in-depth review provide the context for this discussion, the purpose of Phase II was to evaluate how well the RIS policy is working and how it can be improved, rather than to undertake an evaluation of the specific RISs.

Phase II was undertaken through interviews based on a standard set of questions. The questions are reproduced below and have been used as the template for reporting on the results of the interviews. The questions were intended to:

- begin the interviews with a general discussion of the purpose of the RIS requirement to set the context,
- review the experience with the particular RIS in question; and
- finish by applying that experience to the general questions of how the RIS initiative can be improved and whether or not it can usefully be applied to reviews of regulatory policy areas instead of just specific regulatory policy changes.

Appendix A provides a list of those who participated in the interviews.

The following section is a synthesis of the comments made during the interviews, without attribution of the specific comments. It should be noted that there are many different and often conflicting opinions offered during the interviews and, to the extent possible, all of the different views are reported below.

Highlights of Comments Provided

What is the purpose of having Regulatory Impact Statements (RISs)?

The purpose of this question was to set the context for the discussion and to determine how well those involved understand what the RIS is intended to accomplish. It solicited a wide range of responses, including:

Internal Stakeholders

- A majority of government officials responded that the purpose of the RIS is to demonstrate that decisions about regulatory measures have been informed by analysis of the options and implications. These officials generally feel that the RIS provides a framework that encourages appropriate public policy development.
- Some government officials feel that the RIS does not serve a useful purpose because Cabinet Submissions already require that options and implications be fully analyzed. They feel that the RIS biases the decision-making process toward business interests.
- Some officials argued that RISs are not necessary because government decisions are already made based on comprehensive public policy analysis and development.
- A number of government officials indicated that they were not clear about who the audience is and that made drafting of RISs a challenge. Further discussion indicated that, in some cases, training provided by ministry trainers had added to, rather than reduced, that confusion. Additional training in terms of quantitative analysis (cost benefit analysis), consultation and policy analysis and development were suggested.

External Stakeholders

- Several external stakeholders were not aware of RISs or of the specific RIS they were being asked about or that RISs were available on the Ministry of Finance and Corporate Relations website.
- Some external stakeholders were familiar with RISA and its objective, and were in favour of the objective. The point was made that the objective of RISs is not only that comprehensive public policy work be done in support of informed decisions but that the work be seen to be done – the impetus for the RIS came from several decisions which some believed could not possibly have been informed decisions and one of its primary roles is to show that the implications have been considered.

- Some external stakeholders were aware of RISs but were not in favour of the initiative. There were two reasons given. Some believed that the objective is primarily to analyze the issue from a business perspective and argued that there should be other analyses from other perspectives (environmental, social, etc.). Others suggested that the purpose of RISs is simply to justify government decisions and they are primarily communications, rather than policy tools.

These comments indicate that there is growing acceptance of the RIS within government, although there remains some resistance. The extent to which external stakeholders were unaware of the RIS initiative and the specific RISs was notable.

Does this RIS serve a useful purpose?

The purpose of this question was to encourage participants to use a particular RIS as an example. Predictably, there was a range of responses.
Themes that emerged included:

Internal Stakeholders

- For those RISs where the Phase I Review found that requirements had not been met, the RIS authors generally acknowledged many of the problems and suggested that the RIS served a useful purpose as a learning experience.
- For those that were rated as having met most of the RIS requirements by this review, internal stakeholders suggested that the RIS had played a significant role in the public policy development process because the RIS was used throughout the process. They indicated that the RIS also made the final decision generally more acceptable and the officials intend to use the RIS as a consultation tool in future (some already are doing that for other issues).

External Stakeholders

- Generally for those RISs that met the fewest RIS requirements, external stakeholders were unlikely to be aware of the existence of the RIS or to believe that it had served a useful purpose.
- For those RISs that met the most RIS requirements, although some external stakeholders said that the RIS served a useful purpose, others suggested that even though the RIS was well done, it hadn't made much difference because they believed the decision was made in advance of the analysis.

This reinforced the perception that acceptance and support for RIS is growing internally but that RIS have yet to have much of an external effect.

What process was used to create this RIS?

The purpose of this question was to explore further the particular experience associated with the RIS. Sub-questions included: When was the RIS drafted? What role did the RIS requirements play in the policy development process? Is there a clear "public policy" objective? Was there consultation that included consideration of options or alternatives?

Rather than report the specific answers to these questions, the following general themes seemed to emerge:

Internal Stakeholders

- Several of the RISs were drafted at the end of the process, just prior to or just after a decision had been taken. In most of those cases, the issue had been in process for some time prior to the RIS requirement coming into place, making it difficult to include the RIS requirements specifically in the process. Several of the internal stakeholders who were in this situation indicated that they were incorporating RIS requirements in the policy development process for issues currently being addressed.
- The question of options raised discussion in several cases of the fact that many regulatory policy issues are really questions of specific implementation of broad policy decisions set in legislative frameworks, which severely limit the short-term options available. Examples in our sample include environmental and natural resource regulatory frameworks and the WCB framework. In those cases, the broad regulatory framework has already been set and the questions of whether government should intervene or whether regulatory measures should be used are not really open for discussion any more. Rather, the issue at hand is related to the details and the options are often limited. Nevertheless, there are always at least two options – do nothing and do something.
- The issue of the public policy objective also seems to be problematic for some when the options are limited by broad regulatory frameworks, where fundamental change is not currently on the table. In those cases, it seems to be difficult sometimes to remember what the objective of the overall framework was and to fit the objective of the narrow issue being addressed by the RIS within that broad objective.

Nevertheless, that is what is required if the RIS is to successfully explain what government is trying to achieve and to analyze the effectiveness of the various options in achieving the desired outcome – which is necessary if there is to be informed decision-making.

External Stakeholders

- Few external stakeholders had any views in response to this question, other than the views already described under the previous question.

In general, this seemed to reinforce the divergence between those who found the RIS to be useful in guiding public policy work and those who do not believe it is or can be of much value. The discussion with internal stakeholders demonstrated that many are still learning how to use the RIS.

How could this RIS or the process have been improved?

Following up on the previous question, this question is aimed at getting a sense of whether improvement can be expected.

Internal Stakeholders

- Generally those internal stakeholders who see value in the RIS in principle indicated that they learned from this and every RIS experience. The most common revelation was that the RIS is a useful consultation tool, not just a reporting tool.
- There still seems to be some question of whether draft RISs can be used in consultation because of concerns about Cabinet confidentiality. Some do not see this as an issue while others have been reluctant to use draft RISs, primarily because the RIS format seems to require that the recommended or final decision be disclosed and that the RIS be built around the decision.
- Those who see little value in the RIS in principle also learned little from completion of the particular RIS and generally treated it as just one more administrative hurdle to be cleared to get the job done.

External Stakeholders

- Several external stakeholders indicated that having sufficient time to contribute and participate in the process was important and many policy consultations are rushed.

The need to balance allowing time to participate with getting timely decisions was generally recognized.

- Comments were also made about the lack of information in several RISs about who was consulted, how they were consulted, what they said and what effect that had on the analysis.
- Several suggested that a clear description at the beginning of what the consultation process will be and how the RIS will fit into the consultation process would have been useful.
- Comments were also made about the fact that certain RISs did not meet key requirements, such as documentation of the objective, options and implications, suggesting to them that the decision-makers may not have had full information.

How could the RIS Initiative be improved?

The purpose of this question was to get at the heart of the Phase II review – to get input about how to improve the RIS. There were many suggestions including the following. It should be noted that inclusion of the suggestions does not imply that the author agrees or disagrees with the suggestion:

Internal Stakeholders

- **Revise the format.** Several participants found the current format difficult to use and suggested going to a format that has fewer headings. Some, but not all, suggested replacing the questions with more neutral headings, while retaining the questions as a checklist (just not as a specific format requirement).
- **Do not revise the format**. A few indicated that they are just getting used to the format and that it should not be changed.
- **Require RISs to be included with Cabinet Submissions and Requests for Legislation.** The current policy is that an RIS may be attached to a Cabinet Submission at the option of the ministry and that where there is an RIS required, it must be attached to Requests for Legislation. Nevertheless, some internal stakeholders do not believe that is the case and recommended that the policy be put in place or clarified.
- **Coordinate RISs better with other requirements, such as Cabinet Submissions.** A variation on the previous suggestion, several participants believed that the process could be streamlined by integrating better the various requirements, so that there is less need to duplicate effort. For example, it was suggested that the

Cabinet Submission be allowed to reference the attached RIS rather than duplicate much of its content in a different format.

- **Specifically address environmental implications.** Although the guidelines currently suggest that environmental implications be addressed and requires the author to include all relevant implications, environmental implications are not highlighted as a specific category of implication that must be analyzed. If that were highlighted, some feel the credibility and neutrality of RISs would be .improved.
- **Limit RISs to significant and controversial issues**. Some feel that when the BTF recommends that an RIS be drafted for an issue that is not regulatory in nature, not significant or not controversial, the quality of the RIS suffers and the credibility of the RIS initiative suffers. It was suggested that the BTF establish criteria to guide its recommendations, which focuses on issues that are clearly regulatory in nature and relatively significant or controversial.
- **Provide training to senior officials.** Some suggested that those actually responsible for drafting RISs already receive appropriate training but that those officials who direct how the RIS is done and who must approve the final product need to better understand the RIS initiative. Additional training for those responsible for preparing RISs in terms of quantitative analysis, consultation and policy development and analysis was also suggested. It is noted that the Streamlining Initiative already offers this type of training.
- **Remove the BTF from the process**. It was suggested that by giving the BTF the ability to recommend when a RIS should be done biases the process and the RIS towards business interests and reduces the credibility of the RIS initiative.
- **Encourage use of draft RISs in consultations.** Some believe that the RIS is a valuable consultation tool in some cases and that its use should be considered. In particular, some suggested that inclusion of this in the RIS policy would enable those currently concerned about Cabinet confidentiality to release draft RISs during consultations. The policy might also need to be changed to clarify that the recommended option need not be disclosed and that the RIS need not focus on one option.

External Stakeholders

- **Make RISs more accessible.** Several suggested that RISs should be accessible from several websites, including general ministry websites and websites devoted to specific public policy issues when there is a relevant RIS, in addition to the Streamlining Initiative website. In addition, stakeholders suggested that hardcopies be specifically distributed to interested parties when the RIS is released. At present,

while all RIS are published on www.streamline.gov.bc.ca the policy makes it clear that ministries can and should also publicize RISs as appropriate in the circumstances. However, no examples of other ways of publishing RISs wee encountered in the sample.

- **Specifically address environmental implications.** The comments made by internal stakeholders were echoed by some external stakeholders.
- **Consider independent reviews of RISs**. Quality control in some form was raised by some participants. It was generally recognized that a quality control process within government could result in delays and remove responsibility and accountability from the lead agency. However, some believe that the lack of any review, internal or external may have contributed to the RIS requirements not having been met in some cases.
- **Encourage use of draft RISs in consultations.** Several external stakeholders also suggested that draft RISs be used in consultation processes.

Can the principles underlying the RIS be applied to reviews of entire areas of existing regulatory policy?

This is one of the issues raised in the Terms of Reference. There is a desire to undertake full reviews of various broad areas of regulatory policy. These reviews would examine in principle whether government should be intervening and whether the established approach is the best way for government to achieve its public policy objectives, as well as reviewing the specific elements of the regulatory policy.

There were two answers to this question by participants – yes and no. There were some internal and some external stakeholders on each side of the issue. Those who see the most value in the RIS initiative tend to be generally supportive of the use of the RIS in broad regulatory policy reviews while those who see less value tend to not support application of the RIS to these reviews. However, there were exceptions to this general categorization.

Those who believe that the RIS can be used for broad reviews of regulatory policy areas argue that the RIS is simply a description of how public policy analysis should be done and can be applied to virtually any regulatory policy question. Some suggested that the RIS would be even better suited to a broad review than to narrow questions of implementation within an established (and therefore constrained) regulatory framework. Some suggested the format might need to be somewhat more flexible in some cases

while others believe the format (or a revised format with the current 11 questions replaced by fewer, no-question headings) would be sufficiently flexible.

Those opposed to the use of the RIS for this purpose argued that broad policy issues are simply too complex to be captured in an RIS.

One possible compromise suggested was that a report or discussion paper reviewing a broad area of regulatory policy might be accompanied by a draft RIS as part of the consultation process.

Observations Based on Phase II

The foregoing suggests the following general observations:

- To date, the RIS initiative has had a greater impact internally than externally.
- The RIS initiative is not yet a mature government program but it does seem to have considerable and growing internal support, although some remain unconvinced of its value.
- There are some features of the current requirements that could be improved to make the requirements easier to comply with and improve the quality of RISs produced.
- Regardless of what is done, there will always be some internal and external stakeholders who do not support the initiative and there will always be room for improvement. Neither is a reason to stop trying.

Conclusions and Recommendations

The three questions set above for this review to address, the following conclusions have been drawn:

<u>Do the RISs comply with the requirements of the RISA, the RIS Policy and the RIS Guide?</u>

The results from the Phase I review indicate that there was considerable variability in the degree to which RISs published during the period January to October 2000 fulfil the specific requirements of the RISA and associated policy and guidelines. While there are some excellent examples of strong RISs, there are also many that do not meet one or more of the fundamental requirements. That is not surprising given the relatively short

Are the RISs fulfilling the public policy objectives of the RISA?

The Phase II review shows that in some cases the RIS has had a significant impact on how policy work is done while in other cases there remains considerable resistance to the use of the RIS as tool to guide public policy analysis. In other words, to date the policy has had some notable successes but there is still room for considerable improvement. External awareness of RISs is low so RISs have yet to really show that there is informed decision-making in government, a key part of the public policy objective.

Can any improvements be made to the content or format of the RIS Policy and RIS Guide to improve RIS quality in terms of their ability to fulfil the policy objectives?

Having concluded that the RISA and the associated policy and guidelines are not yet fully achieving their public policy goal and that many RIS do nor comply with the fundamental requirements, clearly improvements can be made to the requirements to improve overall RIS quality. As indicated above, many suggestions have been made. The following recommendations suggest some specific measures that could be undertaken.

1. **The format of the RIS should be changed** to:
   - replace the questions currently used as section headings with more neutral section headings;
   - reduce the number of sections to eliminate redundancy; and
   - explicitly require options to be identified and the impacts of all options analyzed.

   Appendix B provides a suggested alternative format, showing how it would compare with the existing format. However, there should be consultation with interested parties within and outside government before a revised format is adopted.

1. **The RIS Policy should explicitly encourage the use of draft RISs as consultation documents and the development of the RIS in an iterative process throughout the policy development process.**

2. **There should be specific criteria adopted by the BTF for when they recommend that an RIS be required under the RISA, and the criteria should focus on issues that are clearly regulatory and have a potentially significant impact or are likely to be controversial.**

3. **Emphasis should be placed on the expectation that Ministries and agencies will appropriately publicize RISs.**

4. **A list of recent RISs together with a brief abstract should be provided to all Streamlining Initiative contacts on a regular basis.**

5. **Efforts should be made to better educate senior officials responsible for approving RISs (especially deputy Ministers and Assistant Deputy Ministers) about the purpose of RISs and the requirements.**

7. **The principles underlying the RIS initiative and, where appropriate, the revised RIS format should be used as the basis for undertaking broad regulatory policy reviews, including forming the basis for consultation documentation and for the public reports or discussion papers resulting from such reviews.**

Appendix A – Participants

Philip Legg	BC Federation of Labour
Anne McMullin	BC Salmon Farmers' Association
Doug Alley	Business Council of BC
David Powell	Canadian Finance and Leasing Association
Suromitra Sanatani	Coalition of Small Businesses of BC
Brian Gilfillen	Council of Forest Industries
Beverly Dunne	Credit Union Central of BC
Peter Carter	Credit Union Central of BC
Paul Bailey	Ministry of Agriculture, Food and Fisheries
Gavin Last	Ministry of Agriculture, Food and Fisheries
Brian Curry	Ministry of Environment, Lands and Parks
Bob Cox	Ministry of Environment, Lands and Parks
Dick Roberts	Ministry of Environment, Lands and Parks
Michelle McLachlin	Ministry of Environment, Lands and Parks
Archie Riddell	Ministry of Environment, Lands and Parks
Sue Stephen	Ministry of Forests
Ian Chapman	Ministry of Forests
Joan Easton	Ministry of Forests
Richard Grieve	Ministry of Forests
Jan Rossley	Ministry of Labour
Reg Faubert	Ministry of the Attorney General
Mark Altree	Mortgage Brokers Association of BC
Tony Mijalika	Mutual Marine Insurance
Kevin Evans	Retail Council of Canada
Michael Goldberg	Social Planning and research Council
David Lane	T. Buck Suzuki Environmental Foundation
Ken Vance	Union of BC Municipalities
Jim Blair	United Fishers and Allied Workers Union
Sophie King	Urban Development Institute
Chris Rolfe	Westcoast Environmental Law
Sheryl Wynne	Workers' Compensation Board of British Columbia

Appendix B – Suggested Revised Format

CURRENT HEADINGS	SUGGESTED HEADINGS
	II. Background Optional section outlining useful background or context to help the reader understand
2. Is government action justified? 3. Is regulation the best form of government action? 4. What is the best regulatory approach? 5. Is there a legal basis for provincial regulatory policy? 6. What is the appropriate level of government for this action?	III. Options Describe the options, including status quo, and why the options were chosen, answering questions 2 to 6 as appropriate.
7. Do the benefits of regulatory policy justify the costs? 8. Will there be an impact on British Columbia's competitiveness?	IV. Implications For each option, describe and analyze the implications addressing questions 7 and 8. That must always include a discussion of how effective the option would be in achieving the objective and also address economic, fiscal, business, social, and environmental implications. Describe and to the extent possible, quantify the costs and benefits of each option using these accounts and any others that the issue requires.
10. Have all the parties had the opportunity to present their views? 11. What are the views of front-line staff?	V. Consultation Describe the consultation process, the participants (including front-line staff) and the impact of the consultations on the analysis
	VI. Decision Optional section describing the decision

	made and summarizing the tradeoffs that decision represents.

It should be noted that most of the suggested headings above are not specifically directed to regulatory concerns but can be applied to any public policy issue. The regulatory impact analysis content of the RIS would arise from the substance of the RIS rather than from the headings used. This should help make it easier to draft RISs in the wide variety of different circumstances that arise.

The list of questions that is the basis of the current RIS format would still apply and be used as a checklist – if the RIS does not answer the questions, then it is not complete. However, the suggest format also clarifies some requirements that seem to be overlooked at times – the need to define the public policy objective and the need to define options, including the Status Quo. The suggested forma also provides a specific opportunity to provide background information to set the RIS in context.

Appendix 7 - List of RISs published to date

PUBLISHED IN 2001

- Review of the Environmental Tobacco Smoke (ETS) Provisions of the *Occupational Health and Safety Regulation*
- Streamside Protection Policy Directives

PUBLISHED IN 2000

- Fishing Industry Regulations — Collecting Assessments from Persons Who Transmit Payments to Commercial Fishers
- Finfish Aquaculture Escape Management Amendments to the *Aquaculuture Regulation* of the *Fisheries Act*
- Wood Residue Burner Fee Rebate Program under the *Waste Management Act*
- Review of the Current Minimum Wage and Rates
- Policy Accord on Government Training
- Homeowner Protection Act Building Envelope Renovation Regulation
- Agri-Food Choice and Quality Act RIS
- *Forest Act* Part 13: Designated Areas
- Amendment to Schedule B of the *Workers Compensation Act*
- Residential Tenancy Act Amendments — Application of the Act
- Licensing Silviculture Contractors — Amendments to the *Employment Standards Act*
- Maternity/Parental Benefits — Amendments to the *Employment Standards Act*
- Cost of Consumer Credit Disclosure Act
- Warranty Disclosure on New Homes Regulation
- Amendments to the *Mortgage Brokers Act* Regulations and *Securities Act Mortgage Rule*
- Bladder Cancer in Aluminum Smelter Workers
- Brewpubs' Eligibility to Apply for Listings to Sell Product Off-Site RIS
- Dam Safety Regulation RIS
- Fish Protection Act RIS
- Islands Trust Natural Areas Intiative
- Municipal Act Reform RIS
- Silviculture — Amendments to the *Employment Standards Act* Regulation
- Taxi Industry Regulatory Reforms — *Motor Carrier Amendment Act, 2000*

PUBLISHED IN 1999

- Economic Deregulation of Motor Carriers and Enhanced National Safety Code Program — Amendments to the *Motor Carrier Act* and *Motor Vehicle Act* RIS
- Food Safety Act RIS
- Municipal Act Reform RIS
- Tuition Assurance Fund Legislation RIS
- Unclaimed Property Legislation RIS

Appendix 8. Major Streamlining Projects Status Summary

Introduction:

Based on themes that have emerged from business consultations, the BTF has sponsored or endorsed a number of major projects addressing key areas. Most of the projects are undertaken by the ministry or agency responsible for the area. Some of the highlights of the projects are included in this Report. The following is a summary of the projects and their status. Project information is maintained on the streamlining website: **www.streamline.gov.bc.ca** Please click on "Major Streamlining Projects".

Project Name	Status	BTF Response
1. Construction		
♦ (Builders Lien Act)	**Complete**	**The BTF is pleased that construction industry Commissioners for Affidavits have been appointed and appear to be an effective streamlining measure for statutory declaration filings.**
♦ Commissioner for Affidavits	**Complete**	
2. Forestry Administration		
♦ Forest Action Plan	**Complete**	**The BTF encourages the Ministry of Forests to continue working with the industry and other interested parties to continue to improve efficiency.**
♦ Sustaining Timber Inventory Targets	**Complete**	
♦ Efficiency Initiative	**Substantially complete**	
♦ Streamlining Legislation	**Ongoing**	
3. Unclaimed Intangible Property	**Complete**	
4. Agriculture:		
♦ Agri-Food Choice and Quality Act	**Complete**	
♦ Food Safety and Food Quality Act	**Substantially complete**	**The Task Force supports this initiative as an important companion to the Agri-Food Choice and Quality Act and**

		encourages the government to introduce the planned Food Safety legislation at the earliest opportunity.
5. Regulatory Impact Statement Requirements	Ongoing	See Task Force recommendations in this report.
6. Consumption Tax Administration	Ongoing	The Task Force supports this project.
7. Crown Land Administration	Ongoing	The Task Force encourages BCAL to continue to streamline the tenure process.
8. Environmental Assessment Projects	Ongoing	The Task Force commends the Environmental Assessment Office for making improvements in British Columbia's environmental assessment process.
9. Local Government Streamlining ♦ Local government/Business Issues ♦ Safety Standards Legislation	Ongoing	The Task Force supports this project, which emphasizes the importance of streamlining at the local government level. The Task Force has asked the UBCM for information on its dialogue with the business community, which task force members could include in newsletters to their associations. The Task Force has also asked the UBCM to consider including the Task Force's work on the agenda at its 2001 conference. The Task Force supports the

	Ongoing	ongoing consultation and advance drafting of the regulations to the proposed consolidation of safety standards.
10. One-Stop Shopping (BC Connects: ♦ Integrated Service Project ♦ OneStop Business Registration Plus ♦ Expansion of One-Stop Business Registration ♦ Regionalization of Canada/BC Business Service Centres ♦ BC Connects ♦ Single Business Number ♦ Consolidation of Forms ♦ Municipal "Best Practices Guide"	 substantially complete substantially complete substantially complete substantially complete See govt. homepage ongoing – see this Report. ongoing ongoing	 The Task Force supports these projects and commends the Ministry of Small Business, Tourism and Culture for its efforts to streamline services for small business. The Task Force strongly urges the Ministry of Municipal Affairs to complete the Best Practices Guide as soon as possible.
11. Liquor Policy Review	substantially complete	The Task Force supports this project. Much progress has been made, but much remains to be done.
12. Payment Timeliness Review	ongoing - attached	The Task Force continues to monitor this project and is pleased with progress made since 1998.
13. Electronic Service Delivery	ongoing	The Task Force supports the

		enacted of the Electronic Transactions Act and the launch of the BC Connects website. We will continue to monitor developments.
14. Environment ♦ New Pollution Prevention Regulations ♦ Review of Contaminated Sites Legislation	ongoing ongoing	The Task Force supports the development of performance-based industry standards as an alternative to permit-based authorizations and encourages the early adoption of the Organic Matter Recycling Regulation. With respect to the Contaminated Sites Regulation Review, the Task Force supports the implementation of the Contaminated Sites Implementation Committee recommendations. However, the Task Force recommends that the entire regime, including legislation, be reviewed.
15. Development Approvals Process Review	Ongoing	The Task Force supports this project and urges the Ministry of Transportation and Highways to expedite both short and long term options to streamline these approvals processes.
16. Regulatory Administration Review	Ongoing	The Task Force endorses this project, which reflects the importance of the effective, efficient enforcement of regulation.

17. Self-Regulatory Organizations Review	Ongoing	The Task Force supports this project.
18. Plain Language Explanatory Program	Ongoing	The Task Force supports this project.
19. Workers Compensation Board Administration	Ongoing	The Task Force supports this project in principle and looks forward to a report of results.
20. Employment Standards Branch Administration	Ongoing	The Task Force supports this project and is encouraged by progress reported by the branch in dealing with complaints backlogs.